

NOT ENDORSED

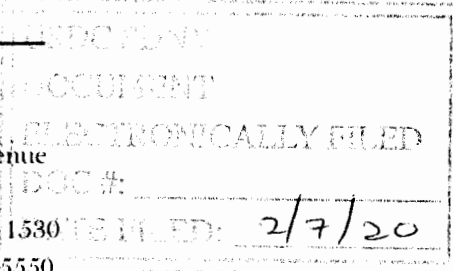
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February 6, 2020

Via ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Carlton Douglas v. Anthem Productions, LLC, et al.*
Docket No.: 18-cv-05789 (VEC)

Dear Judge Gorenstein:

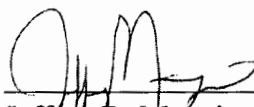
We represent the named-Plaintiff, Carlton Douglas, and the opt-in Plaintiffs, Antonio Brown and Doreen Rodriguez, (collectively as "Plaintiffs"), in the above-referenced wage and hour matter against Anthem Productions, LLC d/b/a Anthem Sound, Stage, and Lighting, Advanced Audio Technology, LLC d/b/a Anthem SSL, Evaggelos Poulos a/k/a Angelo Poulos, individually, Joseph Lodi, individually, and Jason Ojeda, individually, (collectively as "Defendants"), brought pursuant to the Fair Labor Standards Act and New York Labor Law. We write now to respectfully request a thirty-day extension of the Court's deadline to file Plaintiffs' counsel's application for fees pursuant to the Rule 68 offer of judgment, and to submit Plaintiffs' motion for settlement approval with the remaining defendant, Jason Ojeda. (1)

While the parties have completed the agreement with respect to Plaintiffs' settlement with Defendant Ojeda, the parties are in the process of reviewing the agreement with their respective clients and obtaining signatures. Therefore, the parties respectfully request the above-mentioned extension to obtain a fully-executed settlement agreement to be filed with the Court for approval under *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015).

Separately, the parties are in the process of negotiating the attorneys' fees with respect to the Rule 68 defendants and hope to obviate the need for motion practice. Therefore, Plaintiffs' counsel respectfully requests a thirty-day extension of the current deadline, February 10, 2020, to March 9, 2020, to submit the fee application. Defendants consent to the extension request and this is the first request for both extensions. (2)

We thank the Court for its time and attention to this matter.

Respectfully submitted,


Jeffrey R. Maguire, Esq.
For the Firm

To: Defendants' Counsel *via* ECF

Both requests granted.


SO ORDERED: DATE: 2/7/20
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE